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Attorneys for Defendant
11 KAPLAN, INC., erroneously sued as KAPLAN
INTERNATIONAL NORTH AMERICA, LLC
12

13 UNITED STATES DISTRICT COURT
14 NORTHERN DISTRICT OF CALIFORNIA
15

16 KAITLIN RIDLEY, on behalf of herself
and all others similarly situated,

17 Plaintiff,
18

19 v.

20 KAPLAN INTERNATIONAL NORTH
AMERICA, LLC,

21 Defendant.
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Case No. 3:16-cv-02536-JCS

**STIPULATION TO EXTEND TIME FOR
DEFENDANT KAPLAN, INC. TO
RESPOND TO COMPLAINT**

Pursuant to Civil Local Rule 6-1(a), Defendant Kaplan, Inc. (“Defendant” or “Kaplan”)¹ and Plaintiff Kaitlin Ridley (“Plaintiff” or “Ridley”), by and through their respective counsel, hereby stipulate as follows:

WHEREAS, Ridley served her Collective and Class Action Complaint (“Complaint”) on June 1, 2016;

WHEREAS, Kaplan currently has until June 22, 2016 to answer or respond to Ridley’s Complaint;

WHEREAS, Kaplan has requested and Ridley has consented to an additional two weeks for Kaplan’s answer or response to Ridley’s Complaint;

WHEREAS, an additional two weeks for Kaplan’s answer or response to Ridley’s Complaint will not alter the date of any event or any deadline already fixed by Court order;

NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the parties, through their respective counsel, that Kaplan shall answer or otherwise respond to Ridley’s Complaint by July 6, 2016.

Dated: June 22, 2016

DRINKER BIDDLE & REATH LLP

By: /s/ Cheryl D. Orr

Cheryl D. Orr
Valerie D. Kahn
Phillippe A. Lebel

Attorneys for Defendant
KAPLAN, INC., erroneously sued as
KAPLAN INTERNATIONAL NORTH
AMERICA, LLC

¹ Defendant contends that Kaplan, Inc. is the properly named party and that it was erroneously sued as Kaplan International North America, LLC. Plaintiff will amend the complaint to name a different party if appropriate.

1 Dated: June 22, 2016

LICHTEN & LISS-RIORDAN, PC

2
3 By: /s/ Shannon Liss-Riordan

4 Shannon Liss-Riordan

5 Thomas Fowler

6 Matthew D. Carlson

7 Attorneys for Plaintiff

8 KAITLIN RIDLEY

9 I hereby attest that I have on file all holographic signatures corresponding to any
10 signatures indicated by a conformed signature (/s/) within this e-filed document.

11 /s/ Cheryl D. Orr

12 85921082.3

13 Dated: June 24, 2016

